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**Hearing Date: October 23, 2019  
at 10:00 A.M.**

**Related to Doc. Nos. 5161, 5250**

*Counsel to EPI Printers, Inc.*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:

Chapter 11

SEARS HOLDINGS CORPORATION, *et al.*,

Case No. 18-23538 (RDD)

Debtors.<sup>1</sup>

(Jointly Administered)  
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**JOINDER OF EPI PRINTERS, INC. TO THE MOTION OF MIEN CO. LTD.,  
HELEN ANDREWS, STRONG PROGRESS GARMENT FACTORY COMPANY, LTD.,  
SAMIL SOLUTIONS, SHANGHAI FOCHIER, PURCELL MURRAY,  
A&A HK INDUSTRIAL, MINGLE FASHION, MANSHEEN INDUSTRIES, LTD. AND  
AMW VIETNAM CO. LTD. FOR ENTRY OF AN ORDER PURSUANT TO  
11 U.S.C. §§ 1112(B) EITHER DISMISSING THE CASE OR  
CONVERTING THE CASE TO A CHAPTER 7 LIQUIDATION**

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); SHC Licensed Business LLC (3718); A&E LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); SHC Promotions LLC (9626); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC (5554); Sears STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); Sears Brands Management Corporation (5365); and SRe Holding Corporation (4816); The location of the Debtors' corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

**TO: THE HONORABLE ROBERT D. DRAIN  
UNITED STATES BANKRUPTCY JUDGE**

For the reasons set forth in the *Motion of Mien Co. Ltd., Helen Andrews, Strong Progress Garment Factory Company, Ltd, Samil Solutions, Shanghai Fochier, Purcell Murray, A&A HK Industrial, Mingle Fashion, Mansheen Industries, Ltd. and AMW Vietnam Co. Ltd. for Entry of an Order Pursuant to 11 U.S.C. § 1112(b) Either Dismissing the Case or Converting the Case to a Chapter 7 Liquidation* [ECF No. 5161] (the “Conversion Motion”), EPI Printers, Inc., which holds a claim entitled to administrative priority under 11 U.S.C. § 503(b)(9) and a claim for other unpaid administrative expenses that have accrued in this bankruptcy case, submits this joinder to the Conversion Motion as to the dismissal of this case. The arguments and authorities set forth in the Conversion Motion as to the dismissal on conversion of this case are incorporated by reference.

Dated: Detroit, Michigan.  
October 1, 2019

Respectfully submitted,

MILLER, CANFIELD, PADDOCK AND  
STONE, P.L.C.

By: /s/ Ronald A. Spinner

Ronald A. Spinner  
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Attorneys for Creditor EPI Printers, Inc.

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:

Chapter 11

SEARS HOLDINGS CORPORATION, *et al.*,

Case No. 18-23538 (RDD)

Debtors.<sup>1</sup>  
-----

(Jointly Administered)

**CERTIFICATE OF SERVICE**

The undersigned certifies that on October 1, 2019, he caused true and complete copies of the *Joinder of EPI Printers, Inc. to the Motion of Mien Co. Ltd., Helen Andrews, Strong Progress Garment Factory Company, Ltd, Samil Solutions, Shanghai Fochier, Purcell Murray, A&A HK Industrial, Mingle Fashion, Mansheen Industries, Ltd. and AMW Vietnam Co. Ltd. for Entry of an Order Pursuant to 11 U.S.C. §§ 1112(B) Either Dismissing the Case or Converting the Case to a Chapter 7 Liquidation* to be served upon each of the parties listed below via pre-paid properly addressed U.S. mail:

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); SHC Licensed Business LLC (3718); A&E LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); SHC Promotions LLC (9626); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC (5554); Sears STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); Sears Brands Management Corporation (5365); and SRe Holding Corporation (4816); The location of the Debtors' corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

The Honorable Robert D. Drain  
United States Bankruptcy Judge  
United States Bankruptcy Court, S.D.N.Y.  
300 Quarropas Street, Room 248  
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By: /s/ Ronald A. Spinner

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Date: October 1, 2019